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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,

Case No.: 2:19-cv-00652-JAD-DJA

Plaintiff,

VS.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; JOSEPH LOMBARDO,
individually and in his official capacity as
Sheriff; JOHN L. PELLETIER, an
individual; RICHARD E. MAUPIN, an
individual; RYAN J. FRYMAN, an
individual; JUAN D. CONTRERAS, an
individual; ALLEN J. PAVESE, an
individual; BRANDON M. MEADS, an
individual; DOES I – V, individuals.

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE
TO FILE RESPONSE TO
DISPOSITIVE MOTION**

(FIRST REQUEST) [ECF No. 120]

Defendants.

Plaintiff NEBYOU SOLOMON, and Defendants LAS VEGAS METROPOLITAN POLICE DEPARTMENT, JOSEPH LOMBARD, JOHN L. PELLETIER, RICHARD E. MAUPIN, RYAN J. FRYMAN, JUAN D. CONTRERAS, ALLEN J. PAVESE, and BRANDON M. MEADS (collectively “Parties”) by and through their respective counsel, hereby stipulate to the following:

1. The Parties hereby agree and stipulate to that Plaintiff NEBYOU SOLOMON shall have an additional twenty-one (21) days to file his Response in Opposition

1 to LVMPD Defendants' Motion for Partial Summary Judgment (ECF No. 118) filed on
2 October 18, 2021.

3 2. The current Response deadline is November 8, 2021 and the requested
4 extension would make the new deadline be November 22, 2021.

5 3. This extension of time is necessary to because counsel for Plaintiff will be
6 out of the jurisdiction for a week during this time period. Additionally, an associate has
7 recently left the undersigned's law firm, which necessitates hiring and training of a new
8 associate. Furthermore, the undersigned has several competing deadlines during this time
9 period, including a November 1, 2021 deadline for submitting an opening brief and appendix
10 in a public records matter before the Nevada Supreme Court and an October 25, 2021 reply
11 deadline in an anti-SLAPP matter set to be heard on November 3, 2021 before the Eighth
12 Judicial District Court of Nevada.

13 4. This is the first stipulation for an extension of time in this matter and the
14 requested additional time to is ensure proper representation of the Parties' interests and
15 quality briefing.¹

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28 ¹ The deadline to file motions for summary judgment was previously extended.

1 5. This request is made in good faith and is not sought for any improper
2 purpose or for the purpose of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 20th day of October, 2021.

5 **MCLETCHE LAW**

6 /s/ Margaret A. McLetchie
7 Margaret A. McLetchie, NBN 10931
8 Leo S. Wolpert, NBN 12658
9 602 South Tenth Street
10 Las Vegas, NV 89101
11 *Attorneys of Plaintiff Nebyou Solomon*

12 DATED this 20th day of October, 2021.

13 **MARQUIS AURBACH COFFING**

14 /s/ Nicholas D. Crosby
15 Nicholas D. Crosby, NBN 8996
16 10001 Park Run Drive
17 Las Vegas, Nevada 89145
18 *Attorney for Defendants Las Vegas
Metropolitan Police Department; Joseph
Lombardo; John L. Pelletier; Richard E.
Maupin; Ryan J. Fryman; Juan D.
Contreras; Allen J. Pavese; and Brandon
M. Meads*

19 **ORDER**

20 **IT IS SO ORDERED.**

21 
22 U.S. DISTRICT COURT JUDGE

23 10/22/21